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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SOHEIL ZAERPOUR & THE PEOPLE OF THE

UNITED STATES OF AMERICA

Write the full name of each plaintiff.

-against-

UBS GROUP AG, et al.

(see attached rider)

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

\_\_\_\_ CV \_\_\_\_  
(Include case number if one has been assigned)

**COMPLAINT**

Do you want a jury trial?

☒ Yes ☐ No

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?  
U.S. Securities laws, RICO, civil right laws, criminal laws (including computer crimes),  
Foreign corrupt practices law, etc.

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### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, \_\_\_\_\_, is a citizen of the State of  
(Plaintiff's name)

\_\_\_\_\_  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or  
subject of the foreign state of

\_\_\_\_\_.

If more than one plaintiff is named in the complaint, attach additional pages providing  
information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of  
(Defendant's name)

\_\_\_\_\_  
or, if not lawfully admitted for permanent residence in the United States, a citizen or  
subject of the foreign state of

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of  
the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_.

If more than one defendant is named in the complaint, attach additional pages providing  
information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional  
pages if needed.

<b>Soheil</b>		<b>Zaerpour</b>
First Name	Middle Initial	Last Name
<b>16-C Thornton Pl.</b>		
Street Address		
<b>Passaic, Clifton</b>	<b>New Jersey</b>	<b>07012</b>
County, City	State	Zip Code
<b>(862) 668-4036</b>	<b>soheil.zaerpour@njwg.cap.gov</b>	
Telephone Number	Email Address (if available)	

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: See attached rider

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First Name

Last Name

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Current Job Title (or other identifying information)

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Current Work Address (or other address where defendant may be served)

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County, City

State

Zip Code

Defendant 2:

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First Name

Last Name

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Current Job Title (or other identifying information)

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Current Work Address (or other address where defendant may be served)

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County, City

State

Zip Code

Defendant 3:

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First Name

Last Name

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Current Job Title (or other identifying information)

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Current Work Address (or other address where defendant may be served)

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County, City

State

Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence: New York City (& globally)

Date(s) of occurrence: 2002 until present (see NYSD 21-CV-09680 for the details)

#### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Defendant co-conspirator banks coordinated to manipulate foreign exchange prices and benchmark prices against the People of the United States and Plaintiff.

See NYSD 21-CV-09680 (ECF no. 1) for the details.

**INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Loss of principal amount invested and opportunity costs. See NYSD 21-CV-09680 (ECF no. 50 for the details).

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Monetary and punitive damages. See NYSD 21-CV-09680 (ECF no.1) for the details.

Any other relief deemed just and proper by this Court.

**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

26 December 2022

Dated

Soheil

  
Plaintiff's Signature  
Zaerpour

First Name

Middle Initial

Last Name

16-C Thornton Pl.

Street Address

Passaic, Clifton

New Jersey

07012

County, City

State

Zip Code

(862) 668-4036

soheil.zaerpour@njwg.cap.gov

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

**RIDER TO CIVIL COVER SHEET**

**PLAINTIFF(S):**

SOHEIL ZAERPOUR & THE PEOPLE OF THE UNITED STATES

Plaintiff's address: 16-C Thornton Pl. Clifton, New Jersey 07012, USA.

**DEFENDANTS:**

BANK OF AMERICA CORPORATION; BANK OF AMERICA, N.A.; BARCLAYS BANK PLC; BARCLAYS PLC; BARCLAYS CAPITAL, INC.; BNP PARIBAS GROUP; BNP PARIBAS USA, INC.; BNP PARIBAS S.A.; BNP PARIBAS SECURITIES CORP.; CITIGROUP, INC.; CITIBANK, N.A.; CITIGROUP GLOBAL MARKETS, INC.; CREDIT SUISSE GROUP AG; CREDIT SUISSE AG; CREDIT SUISSE INTERNATIONAL; CREDIT SUISSE SECURITIES (USA) LLC; DEUTSCHE BANK AG; DEUTSCHE BANK SECURITIES INC.; THE GOLDMAN SACHS GROUP, INC.; GOLDMAN, SACHS & CO. LLC; HSBC HOLDINGS PLC; HSBC BANK PLC; HSBC NORTH AMERICA HOLDINGS INC.; HSBC BANK USA, N.A.; HSBC SECURITIES (USA) INC.; J.P. MORGAN CHASE & CO.; J.P. MORGAN CHASE BANK, N.A.; J.P. MORGAN SECURITIES LLC; MERRILL LYNCH, PIERCE, FENNER & SMITH INC.; MUFG BANK, LTD.; MUFG SECURITIES AMERICAS INC.; MORGAN STANLEY; MORGAN STANLEY & CO., LLC; MORGAN STANLEY & CO. INTERNATIONAL PLC; NATWEST MARKETS SECURITIES INC.; RBC CAPITAL MARKETS LLC; THE ROYAL BANK OF CANADA; ROYAL BANK OF SCOTLAND PLC; SG AMERICAS SECURITIES LLC; SOCIETE GENERALE S.A.; STANDARD CHARTERED BANK; STANDARD CHARTERED SECURITIES (NORTH AMERICA), INC.; UBS AG; UBS GROUP AG; and UBS SECURITIES LLC

**DEFENDANT(S) ADDRESS(ES) AND COUNTY(IES):**

Bank of America Corporation has corporate offices located at 100 N. Tryon St., Charlotte, NC, 28255.

Bank of America, N.A. has corporate offices located at 100 N. Tryon St., Charlotte, NC, 28255.

Barclays Bank PLC has offices located at 745 7th Avenue, New York, NY 10019.

Barclays PLC has corporate offices located at 1 Churchill Place, London E14 5HP, United Kingdom.

Barclays Capital, Inc. has offices located at 745 7th Avenue, New York, NY 10019.

BNP Paribas Group's headquarters is located at 16, boulevard des Italiens, 75009 Paris, France

BNP Paribas USA, Inc. has offices located at 787 Seventh Avenue , New York, NY 10019.

BNP Paribas S.A. has offices located at 787 Seventh Avenue , New York, NY 10019.

BNP Paribas Securities Corp. has offices located at 787 Seventh Avenue , New York, NY 10019.

Citigroup, Inc. has corporate offices located at 388 Greenwich Street New York, NY 10013.

Citibank, N.A. has offices located at 388 Greenwich Street New York, NY 10013.

Citigroup Global Markets, Inc. has offices located at 388 Greenwich Street, New York, NY 10013.

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Credit Suisse Group AG has corporate offices located at 11 Madison Avenue, New York, NY 10010.

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Credit Suisse AG has offices located at 11 Madison Avenue, New York, NY 10010.

Credit Suisse International has corporate offices located at One Cabot Square, London, E14 4QJ, United Kingdom.

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Credit Suisse Securities (USA) LLC has offices located at 11 Madison Avenue, New York, NY 10010.

Deutsche Bank AG has offices located at 60 Wall Street, New York, NY 10005.

Deutsche Bank Securities Inc. has offices located at 60 Wall Street, New York, NY 10005.

The Goldman Sachs Group, Inc. has offices located at 200 West Street, New York, NY 10282.

Goldman, Sachs & Co. LLC has offices located at 200 West Street, New York, NY 10282.

HSBC Holdings PLC has corporate offices located at 8 Canada Square, London, E14 5HQ, United Kingdom.

HSBC Bank PLC has corporate offices located at 8 Canada Square, London, E14 5HQ, United Kingdom.

HSBC North America Holdings Inc. has an office located at 452 Fifth Ave., New York, NY 10018.

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HSBC Bank USA, N.A. has an office located at 452 Fifth Ave., New York, NY 10018.

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HSBC Securities (USA) Inc. has an office located at 452 Fifth Ave., New York, NY 10018.

J.P. Morgan Chase & Co. has corporate offices located at 270 Park Avenue, New York, NY 10017.

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J.P. Morgan Chase Bank, N.A. has corporate offices located at 1111 Polaris Parkway, Columbus, OH 43240.

J.P. Morgan Securities LLC has offices located at 277 Park Avenue, New York, NY 10172 .

Merrill Lynch, Pierce, Fenner & Smith Inc. has corporate offices located at One Bryant Park, New York, NY 10036.

MUFG Bank, Ltd. has an office located at 1251 Avenue of the Americas, New York, NY 10020-1104.

MUFG Securities Americas Inc. has offices located at 1221 Avenue of the Americas, New York, NY 10020-1001.

Morgan Stanley has corporate offices located at 1585 Broadway Avenue, New York, NY 10036.

Morgan Stanley & Co., LLC has corporate offices located at 1585 Broadway Avenue, New York, NY 10036.

Morgan Stanley & Co. International PLC has offices located at Cabot Square, Canary Wharf, London, E14 4QA, United Kingdom.

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NatWest Markets Securities Inc. has corporate offices located at 600 Washington Boulevard Stamford, CT 06901.

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RBC Capital Markets LLC has offices located at 200 Vesey Street, 9<sup>th</sup> Floor, New York, NY 10281.

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The Royal Bank of Canada has corporate offices located at 200 Bay Street, Royal Bank Plaza, Toronto, ON M5J 2J5, Canada.

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Royal Bank of Scotland PLC has corporate offices located at 36 St Andrew Square, Edinburgh, United Kingdom, EH2 2YB.

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SG Americas Securities LLC has corporate offices located at 245 Park Avenue, New York, NY 10167.

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Societe Generale S.A. has corporate offices located at 29 Boulevard Haussmann 75009 Paris, France.

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Standard Chartered Bank has corporate offices located at 1 Basinghall Avenue, London, EC2V 5DD, United Kingdom.

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Standard Chartered Securities (North America), Inc. has corporate offices located at 1095 Avenue of the Americas, New York, NY 10036.

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UBS AG has offices located at 1285 Avenue of the Americas, New York, NY 10019.

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UBS Group AG has corporate offices located at Bahnhofstrasse 45, Zurich, 8001 Switzerland.

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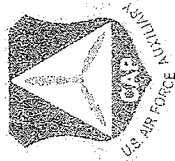
UBS Securities LLC has offices located at 1285 Avenue of the Americas, New York, NY 10019.

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# Glider Academy

NERGCOE  
CIVIL AIR PATROL  
HARTNESS STATE AIRPORT  
NORTH SPRINGFIELD, VERMONT



This certificate is awarded to

**1Lt. Sohell Zaerpour**

For completion of the Northeast Region Glider Center of Excellence held at the Hartness State Airport  
in North Springfield Vermont from Aug. 6 2011 until Aug. 14 2011

SPRINGFIELD COMPOSITE SQUADRON  
CIVIL AIR PATROL  
HARTNESS STATE AIRPORT  
NORTH SPRINGFIELD, VERMONT

*Paul Finestone*  
Capt. Paul Finestone  
Date 8-14-11

*Dale Hardy*  
Col. Dale Hardy  
Date 8-14-11



# King Schools Certification

Training Completion Certificate

*This is to certify that*

**Mr. Soheil Zaerpour, MSc.**

has completed the King Schools Course

**Flying the Citation Mustang—Single Pilot**

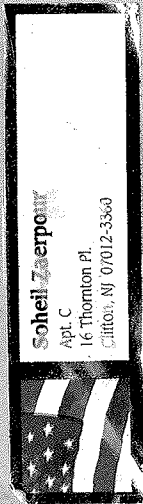
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**May 31, 2015**

*John King*  
John King  
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*Martha King*  
Martha King  
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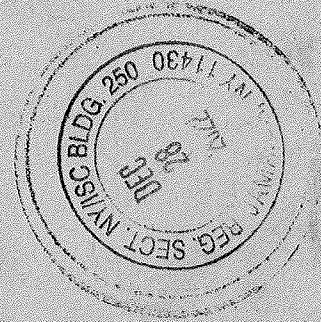
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